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10 **UNITED STATES DISTRICT COURT**  
11 **DISTRICT OF NEVADA**

12  
13 UNITED STATES OF AMERICA,  
14 Plaintiff,  
15 v.  
16 JOSHUA A. MARTINEZ,  
17 Defendant.

Case No. 2:21-cr-00219-APG-DJA

**STIPULATION TO MODIFY  
CONDITIONS OF RELEASE**

18 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel  
19 Schiess, Assistant United States Attorney, counsel for the United States of  
20 America, and Joanne L. Diamond, Assistant Federal Public Defender, counsel for  
21 Joshua Martinez, that the Court modify his conditions of release.

22 The Stipulation is entered into for the following reasons:

23 1. On September 10, 2021, the Court ordered Mr. Martinez's release on  
24 a personal recognizance bond with certain conditions, including (1) a requirement  
25 to submit to a mental health evaluation, and participate in mental health  
26 treatment, as directed by pretrial services, ECF No. 13 at 4; and (2) a travel  
restriction allowing him to travel only within a six-mile radius of his home for the  
purposes that he is allowed out of his residence, ECF No. 13 at 6.

1       2. This Court previously approved the parties' stipulation allowing Mr.  
2 Martinez to attend appointments with a mental health provider in Overton,  
3 Nevada, which is outside the six-mile approved radius of travel from his home.  
4 ECF No. 21. That mental health provider recently left the area. Mr. Martinez has  
5 found a new provider in Mesquite, Nevada, which is also outside the six-mile  
6 approved radius of travel.

7       3. Mr. Martinez therefore moves the Court to modify his bond  
8 conditions to permit him to travel to Mesquite, Nevada, with the prior permission  
9 of Pretrial Services.

10      4. Counsel has spoken with Pretrial Services concerning this issue.  
11 Pretrial Services support the requested modification.

12      5. The government has no objection to the requested modification.

13      DATED: February 27, 2023.

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15      RENE L. VALLADARES  
16      Federal Public Defender

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18      JASON M. FRIERSON  
19      United States Attorney

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21      */s/ Joanne L. Diamond*  
22      By \_\_\_\_\_  
23      JOANNE L. DIAMOND  
24      Assistant Federal Public Defender

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26      */s/ Daniel Schiess*  
27      By \_\_\_\_\_  
28      DANIEL SCHIESS  
29      Assistant United States Attorney

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,  
v.  
JOSHUA A. MARTINEZ,  
Defendant.

Case No. 2:21-cr-00219-APG-DJA

**ORDER**

IT IS THEREFORE ORDERED that Mr. Martinez's conditions of release be modified to allow him to travel to Mesquite, Nevada, with the prior permission of Pretrial Services.

DATED March 1, 2023

UNITED STATES MAGISTRATE JUDGE